

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: September 12, 2024 at 1:00 P.M. ET

Objection Deadline: July 24, 2024 at 4:00 P.M. ET

Ref. Nos. 17631 & 17643

**CERTIFICATION OF COUNSEL REGARDING DEBTORS' FORTY-FIFTH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

I, Matthew R. Pierce, counsel to FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (the “Debtors”) hereby certify as follows to the best of my knowledge, information and belief:

1. On June 14, 2024, the Debtors filed the *Debtors' Forty-Fifth (Substantive) Omnibus Objection to Certain Overstated and/or Unliquidated Proofs of Claim (Customer Claims)* [D.I. 17631, redacted & 17643, sealed] (the “Objection”).

2. Pursuant to the Notice of Objection attached to the Objection [D.I. 17631-1 & 17643-1], any responses to the Objection were to be filed no later than July 24, 2024, at 4:00 p.m. (ET) (the “Response Deadline”).

3. The Debtors received informal responses (the “Informal Responses”) to the Objection from the holders of claim numbers 68, 1896, 2042, 85349, 88217, 71129, 62755, 1298,

¹ The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

and 62736.

4. On July 10, 2024, Jean Tripier filed a letter in response to the Objection [D.I. 19970] (the “Tripier Response”).

5. On July 17, 2024, Momentum Trading GmbH filed letters in response to the Objection [D.I. 20748 & D.I. 20749] (the “Momentum Responses”).

6. On July 17, 2024, Colin Griffiths filed a letter in response to the Objection [D.I. 20745] (the “Griffiths Response”).

7. On July 19, 2024, Lesley Zut filed a letter in response to the Objection [D.I. 20859] (the “Zut Response”).

8. As of the Date hereof, no other formal responses or other responses to the Objection have been filed or served on the Debtors.

9. The Debtors have agreed to revise the proposed form of order attached to the Objection (the “Proposed Order”) to resolve the Informal Responses from the holders of claim numbers 68, 1896, 2042, and 1298.

10. The Debtors resolved the Informal Responses from the holders of claim numbers 71129 and 85349 without modification to the schedule attached to the proposed form of order.

11. The Debtors have revised the Proposed Order (the “Revised Order”), a copy of which is attached hereto as **Exhibit A**, to reflect the above revisions and the adjournments of the Objection with regard to the claims of Momentum, Griffiths, Tripier, and Zut and holders of proofs of claim numbers 88217, 62755 and 62736. A copy of the Revised Order compared against the proposed form of order attached to the Objection is attached hereto as **Exhibit B**. The Revised Order has been circulated to the Official Committee of Unsecured Creditors (the “Committee”) and the holders of claim numbers 68, 1896, 2042, and 1298. The holders of claim numbers 68,

1896, 2042, and 1298 and the Committee have no objection to the entry of the Revised Order. In accordance with the Court's electronic order processing procedures, a clean copy of the Revised Order shall be uploaded to CM/ECF.

12. Accordingly, the Debtors respectfully request that the Court enter the Revised Order at its earliest convenience.

Dated: December 19, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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